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August 14, 2020

**VIA ECF**

Honorable Ronnie Abrams  
United States District Judge  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: Manuel Iyehen v. City of New York, et al.  
20 Civ. 3448 (RA)

Your Honor:

I am an Assistant Corporation Counsel in the Special Federal Litigation Division of the New York City Law Department, and the attorney representing Defendant City of New York in the above-referenced matter. Defendant City writes to respectfully request Your Honor's review and endorsement of the enclosed so-ordered subpoena to obtain Plaintiff Manuel Iyehen's medical records pertaining to his psychological treatment, which he allegedly received as a result of the incident at issue in this case.

By way of background, Plaintiff is claiming that, on May 31, 2017, he was categorized as an emotionally disturbed person by members of the New York City Police Department and was then transported to Jacobi Hospital. Plaintiff also claims that while at Jacobi Hospital several officers used unreasonable force against him. Pursuant to a HIPAA release provided by Plaintiff, this Office contacted Jacobi Hospital to obtain his medical records. That provider, however, informed us that it is unable to provide psychiatric records without a so-ordered subpoena. To avoid any undue delay, Defendant respectfully requests that the Court endorse the enclosed proposed subpoena, so that it can be served as soon as possible in the hopes of obtaining Plaintiff's medical records from Jacobi Hospital.<sup>1</sup>

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<sup>1</sup> Defendant has not included Plaintiff's full social security number and date of birth on this subpoena because it is filed electronically, and such information is prohibited in public filings pursuant to Rule 5.2 of the Federal Rules of Civil Procedure. When serving this subpoena upon Jacobi Hospital, however, Defendant will include a HIPAA release executed by Plaintiff, which includes that information.

Defendant City of New York thanks the Court for its attention to this matter.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "John L. Garcia", with a stylized flourish at the end.

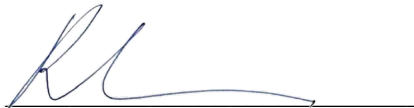
John L. Garcia  
*Assistant Corporation Counsel*

Encl.

cc: Masai Lord, Esq.  
*Attorney for Plaintiff*

No later than August 21, 2020, Plaintiff shall inform the Court whether he objects to the City's proposed subpoena.

SO ORDERED.

A handwritten signature in blue ink, appearing to read "Ronnie Abrams", with a horizontal line extending to the right.

Hon. Ronnie Abrams  
8/17/2020